

Temporary variances for researchFrom: MJohnson@nc-plus.com%inter2 [MJohnson@nc-plus.com] on behalf of MJohnson@nc-plus.com  
Sent: Wednesday, February 23, 2005 9:24 AM  
To: NOSB Crops; Torres, Francine  
Subject: Temporary variances for research

Attachments: ATTACHMENT.TXT

I am writing to you concerning the need and use of temporary variances for research purposes.

As an organic seed company, one of our goals, is to provide the best genetics and seed products to our customers. To do this, we are always looking for products best suited for the organic grower. We look at a wide range of products from a wide variety of sources. We look at our own data, as well as data from other sources, and by early January have selected products that we believe have promise. However in too many instances, when we attempt to access this material, it has already been treated with synthetic seed treatments. Our preference is always to use untreated seed in our testing program, but we feel it is a disservice to our customers when we can not evaluate the full spectrum of potential seed products.

We are aware of the present allowance for temporary variance for research purposes. For these variances to be useful, we would request the following;

1. Clearer application procedures for those seeking the variances, perhaps even a simple standardized form that clearly identifies the information needed.
2. Rapid determination if the variance is to be granted, we would suggest no more than 30 days from the time the application is received until a determination is made and communicated to the applicant.
3. An authoritative document is provided to those granted a variance, so that certifiers and cooperating growers recognize the legitimacy of using synthetically for research purposes.

If organic seed producers are going to have the best opportunity to select and grow the best seed products for organic farmers, we ask that the three steps above be considered and adopted.

Thank-you.

Maury Johnson  
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